

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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|----------------------------|---|------------------------------------|
| STEPHANIE C. |) | |
| |) | |
| Plaintiff, |) | Civil Action No. 1:13-cv-13250-DJC |
| |) | |
| vs. |) | |
| |) | |
| BLUE CROSS AND BLUE SHIELD |) | |
| OF MASSACHUSETTS HMO BLUE, |) | |
| INC. |) | |
| |) | |
| Defendant. |) | |

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Plaintiff Stephanie G., by and through her undersigned counsel and pursuant to F.R.Civ.P. 56, submits her Motion for Summary Judgment against Defendant Blue Cross and Blue Shield of Massachusetts HMO Blue, Inc. ("BCBS"). The Plaintiff's Rule 56(f) Statement and her Memorandum of Points and Authorities in Support of her Motion for Summary Judgment are submitted concurrently with this Motion.

Plaintiff's son, Miles G., received medical treatment in the State of Utah and had health insurance coverage under a group health plan insured by BCBS. Claims for coverage of Miles G.'s medical expenses were submitted to BCBS and denied. Plaintiff appealed the denial of coverage and exhausted the appeal process as required under the terms of the group plan.

The pre-litigation record compiled by BCBS during the relevant time frame has been stipulated to by the Plaintiff and previously provided to the Court.

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DATED this 30th day of July, 2014.

/s/ Jonathan M. Feigenbaum
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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants identified by the Court and there are no non-registered participants.

/s/ Jonathan M. Feigenbaum